

[Email from "Jean Public@Yahoo.com", sent to Linda Hormes and Eldert Bontekoe on 4/10/2004]

vol 69 no 64 page 17531 on emission durability for alleged "light duty" trucks - why suv's get in under this category is way way beyond me and should be stopped now.

comment on page 3 of 33 - I think the useful life should be and must be made to be 10 years and heavy duty 13 years. Nobody drives 10,000 miles a year anymore - nobody.

page 6 - Manufacturers always complain that processes are too expensive, however if they are the right and correct processes then the publish must push back to see that they are maintained. We cannot let manufacturers produce any old thing they want to. The american public clearly has a right to require and force manufacturers to produce vehicles that last and this agency should be promoting that for the american public and not falling over backwards and kowtowing to industry as it does.

I think real world testing, where ordinary people drive the ordinary miles they drive, such as some in vermont, some in nj with its congestion, some in nevada, some in california, etc. can be more reliably used as test models for real world information on vehicle use.

I think the EPA approval criteria should require the mfr. to demonstrate that the durability procedure would cover ALL of in use vehicles' emission procedures. I see no reason why some unlucky buyer should be forced to pay for his own repairs when the vehicle does not meet standard. I have experienced much of that from car manufacturers when they walk away from problems in their own manufacturing process and expect consumers to ante up to pay for their errors.

page 10 of 33 - EPA issues certificate of conformity based on what the mfr tells them - that is not a good way for producing good work but simply relies on a manufacturer's honesty. The endless car recalls that other agencies engage in shows that the mfrs cannot be trusted to submit accurate, honest information and certainly cannot be counted on to honestly repair all of the errors they make. We must make them do this. That is what this agency SHOULD BE DOING, BUT IS INSTEAD FALLING ON ITS FACE TO AVOID DOING. WE CANNOT EVER BLINDLY ACCEPT WHAT IS SUBMITTED BY MFRS. NOT EVER.

page 11 - third para - Production variability sentence - change the percentage from 90% to 98%. We need to make better vehicles that meet stds.

page 12 - I think there should be before treatment .

SUVs are polluting with this exemption. America expects more stringent standards for SUV's.

page 14 - i think real world testing is far better than whole vehicle aging. I do not believe dynamometer or track use is accurate.

page 15 - change bottom paragraph to read 98% coverage.

page 16 - first sentence at top of page - if epa KNEW THIS why did they ever accept this kind of information in the past? No wonder the court had to step in since this was slipshod work by EPA.

strawman road cycle - change percent from 90 to 98%.

The time it takes to get accurate figures is not a problem for most americans if they are finally getting truthful information. Americans want truthful meaningful information, not slipshod hurry up work that is garbage.

page 17 - If it takes 89 days to get truthful information, so be it.

I do not believe there should be any exemption allowing mfrs to terminate milage accumulation early at a minimum of 75%. If the whole vehicle breaks down at 80, that doesnt show the truth as to the vehicle's operation. I am not interested in saving any manufacturer money, I want a good safe car that gets lots of miles per gallon. I do not understand why this agency has so failed to make suv's get gas milage improvement of 500%.

page 18 - I do not agree with the statement that "it is possible to replace a long period of catalyst exposure at a certain temperature with a shorter period of time at a higher temperature". I do not believe that statement at all and take issue with its use in this proposal as truth.

If results are based on drivers driving 70 mph, these results are way off base since drivers are driving 80 mph, 90 mph and 100 mph routinely these days. At 70 on highways in NJ you get passed by virtually every single car on the highway.

page 19 - the 70 mph is much too low a number to make any calculations based on that number. 55 mph is certainly long gone. drivers go that fast on back town streets now.

page 20 - 3rd para - I do not agree with the statement that the "bench cycle does not need to exactly replicate what happens in use". I think it does have to replicate what happens in use.

page 22 - I do not think meeting individually with

auto mfrs was necessarily a good idea in private. I think the public should always be invited to all meetings so that we know no secret dealings are going on. The auto mfrs have alot of money to spend to get their way. I see little to no pushback against that influence at this agency.

page 23 - Your biggest stakeholder is the american public. That is who you need to defend and make whole--not auto special interest industries.

I disagree with the auto mfrs that the strawman road cycle was too severe.

page 25 - Using a high speed driving mode of 60-75 is not real world anymore. Nobody goes 30 anymore at all. The road speeds drivers are going are much higher than that so this kind of using bad numbers is not a good omen to get accurate data.

page 27 - This proposal generally seems too "friendly" to mfrs.

I do not think mfrs should be able to customize the standard EPA whole vehicle and bench aging durability processes. I disagree with allowing customization of the SRC to include running the SRC for a shorter or longer period of time than specified.

page 28 - The candidate cars should not be employee cars or those connected in any way with the mfrs for the money involved.

page 29 - I think there should be fines set of \$1,000,000 for any attempt to bias any employees in setting these standards.

I object to "customized" alternatives - they are too easy to use to bribe someone with floating rules. Weneed standards that apply to all.

Add some words to read: Manufacturers'engineers must use good, sound, unbiased engineereing judgment in making these decisions.

these are my comments for the public record.

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